



12/15/2020

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December 15, 2020

VIA ECF

Hon. Vernon S. Broderick
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED

SO ORDERED *[Signature]*

VERNON S. BRODERICK

U.S.D.J. 12/15/2020

Re: *R.A. and B.A. obo A.A v. N.Y.C. Dep't of Educ.*, 20-cv-4275(VSB)(SN)

Dear Judge Broderick:

I am an Assistant Corporation Counsel in the office of Corporation Counsel James E. Johnson, a supervising attorney for Defendant in the above-referenced action wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, et seq. ("IDEA"), as well as for this action.

I write on behalf of all parties to respectfully request a 30-day extension of the parties' time to file a joint letter as required by the Court at Dkt. Nos. 15 and 16. Preliminarily, the parties apologize for their failure to make this request timely, and regret the inconvenience caused for the Court. The undersigned takes full responsibility for this lapse which occurred due to COVID-19 related administrative difficulties.

This is the first request for an extension of this deadline. The parties are hopeful that they will be able to fully resolve this case prior to January 18, 2021 thereby relieving the Court of the burden of any litigation in this case. We note that the Defendant and the Dayan firm have successfully resolved all similar actions for IDEA fees over the past several years without the need for any Court intervention, and expect that this case will take that same course.

Accordingly, the parties respectfully request that their time to file a joint letter be extended to January 18, 2021.

Thank you for considering this request.

Respectfully submitted,

/s/

Martin Bowe
Senior Counsel

cc: Adam Dayan, Esq (via ECF)